

**EXHIBIT VV**



**ATTORNEYS AT LAW**

ONE MARITIME PLAZA, SIXTH FLOOR  
SAN FRANCISCO, CA 94111-3409  
415.434.4484 TEL  
415.434.4507 FAX  
foley.com

WRITER'S DIRECT LINE  
415.984.9819  
larnold@foley.com EMAIL

CLIENT/MATTER NUMBER  
085437-3000

November 5, 2007

Barbara J. Chisholm  
Altshuler, Berzon LLP  
177 Post Street, Suite 300  
San Francisco, CA 94108

**Re: Stanford Hospital & Clinics/Lucile Packard Children's Hospital  
SEIU, Local 715**

Dear Ms. Chisholm:

I enclose a letter received from Daniel Boone of Weinberg, Roger & Rosenfeld, dated October 18, 2007, to which I do not intend to respond. The letter states that if the Hospitals do not contact that firm and select arbitrators within a specified date, a petition to compel arbitration will be filed. I refer you to my letter to you of August 16, 2007, in which I advised that in view of your failure to respond to the inquiry concerning the basis upon which Weinberg, Roger & Rosenfeld is providing legal services to the purported SEIU, Local 715, Stanford Hospital & Clinics and Lucile Packard Children's Hospital would not be participating in any selection process for arbitrators involving that firm, nor would they participate in any arbitration hearing at which an attorney from that firm appears. Please be advised that this position has not changed.

In addition, SEIU, Local 715, has been advised previously, by correspondence from the Hospitals to designated stewards, that the Hospitals do not intend to arbitrate the grievance regarding the failure to remit dues, entitled "All affected; Dues Withholdings." SEIU, Local 715 was advised in March, 2007, in writing, that dues would not be remitted unless and until the Hospitals receive information that enables them to conclude that SEIU, Local 715 continues to exist as an ongoing viable labor organization eligible to receive dues or service fees from the Hospitals' employees. Despite repeated requests for such information by the Hospitals, SEIU, Local 715 has refused to provide it. The stewards have also been advised previously that the Hospitals have no intention of arbitrating the grievances entitled "All Affected: Union Access" and "All Affected: Union Access (Union Reps Hereth & Olick Arrests)," both of which involve the denial of access to, or the removal from the premises of, employees of SEIU-UHW. The Hospitals long ago rejected the purported servicing agreement between SEIU, Local 715 and SEIU-UHW. Employees of SEIU-

BOSTON  
BRUSSELS  
CENTURY CITY  
CHICAGO  
DETROIT

JACKSONVILLE  
LOS ANGELES  
MADISON  
MILWAUKEE  
NEW YORK

ORLANDO  
SACRAMENTO  
SAN DIEGO  
SAN DIEGO/DEL MAR  
SAN FRANCISCO

SILICON VALLEY  
TALLAHASSEE  
TAMPA  
TOKYO  
WASHINGTON, D.C.



FOLEY & LARDNER LLP

Barbara J. Chisholm

November 5, 2007

Page 2

UHW are not covered in any manner by the collective bargaining agreement, and enjoy no rights thereunder. Thus, the alleged violation of a contractual right relating to such strangers to the agreement cannot give rise to a grievance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurence R. Arnold', written over the printed name.

Laurence R. Arnold

LRA:sey

Enclosure

cc: Laurie Quintel

IRVING WEINBERG  
DAVID A. ROSENFELD  
WILLIAM A. JICKOL  
VICTORIA A. HARRINGTON JR.  
WILLIAM BOONE  
HILARY MICKELSON  
HARRY E. HINKLE  
JAMES RUTKOWSKI  
ANDREA RAE BENSON  
CHRISTIAN L. RAISNER  
JAMES J. WESSER  
THEODORE FRANKLIN  
ANTONIO RUIZ  
MATTHEW J. GAUGER  
ASHLEY K. IKEDA  
LINDA BALDWIN JONES  
PATRICIA A. DAVIS  
ALAN G. CROWLEY  
FELIX DE LA TORRE  
KRISTINA L. HILLMAN  
ANDREA LAIACONA  
EMILY P. RICH

**WEINBERG, ROGER & ROSENFELD**

A PROFESSIONAL CORPORATION

1001 Marina Village Parkway, Suite 200  
Alameda, CA 94501-1091  
TELEPHONE 510.337.1001  
FAX 510.337.1023

LORIK AQUINO  
ANNE I. YEN  
NICOLE M. PHILLIPS  
BRUCE A. HARLAND  
CONCEPCION E. LOZANO-BATISTA  
CAREN P. SENCER  
LINELLE S. MOGADO  
MANJARI CHAWLA  
KRISTINA M. ZINNEN  
JANNAN V. MANANSALA  
MANUEL A. BOIGUES

PATRICIA M. GATES, Of Counsel  
ROBERTA D. PERKINS, Of Counsel

\* Also admitted in Arizona  
\*\* Admitted in Hawaii  
\*\*\* Also admitted in Nevada  
\*\*\*\* Also admitted in Illinois

October 18, 2007

VIA FACSIMILE & US MAIL

Laurence R. Arnold  
Foley & Lardner LLP  
One Maritime Plaza, 6th Floor  
San Francisco, CA 94111-3409

FOLEY & LARDNER LLP  
RECEIVED  
OCT 19 2007

Re: SEIU Local 715

Stanford Hospital and Clinics

1. All Affected: Dues Withholdings  
(FMCS Case No. 070618-57704-A – FMCS Panel dated June 18, 2007)
2. All Affected: Retaliation Against Union Stewards  
(FMCS Case No. 070608-57417-A – FMCS Panel dated June 8, 2007)
3. All Affected: Union Access  
(FMCS Case No. 070405-55451-A – FMCS Panel dated April 5, 2007)
4. John Simien Harassment - Accusation Leading to Shift Change  
(FMCS Case No. 070622-57865-A – FMCS Panel dated June 22, 2007)
5. James Satuito Discharge  
(FMCS Case No. 070621-57494-A- Second FMCS Panel dated June 21, 2007)
6. All Affected: Union Access (Union Reps Hereth & Olick Arrests)  
(FMCS Case No. 070618-57692-A – FMCS Panel dated June 18, 2007)
7. Oscar Portillo - Denied Vacation Requests/Harassment & Discrimination  
(FMCS Case No. 070725-58848-A – FMCS Panel dated July 25, 2007)

Dear Mr. Arnold:

This firm represents SEIU Local 715 in the above-captioned matters.

Listed above are grievances currently pending Arbitrator selection. You are the attorneys for Stanford Hospitals and Clinic. We have FMCS panels in each of these matters, and have tried to contact you to select Arbitrators on numerous occasions; however, you have been non-responsive to our emails and telephone calls.

I will recite our attempts to select Arbitrators, in order of the cases listed above.

October 18, 2007  
Laurence R. Arnold  
Page 2

All Affected: Dues Withholdings: The FMCS panel was requested on June 18, 2007. On July 17, 2007, an e-mail was sent from Barbara Gorin to you and Laurie Quintel asking you to contact her to select an Arbitrator from the June 18 panel.

Since there was no response to that e-mail, Ms. Gorin sent you and Ms. Quintel another email on July 24, once again, listing all the pending cases, and asking you to contact her to select Arbitrators. On that same day, Marveline Carrell of our office left you a voice mail message, following up on the previous emails.

Since we did not receive any response, on August 21, 2007, Barbara Gorin sent you another e-mail, with a copy to Laurie Quintel, again listing the pending cases, and asking you to contact her to select Arbitrators.

There has been no response to date.

All Affected: Retaliation Against Union Stewards: The FMCS panel was requested on June 8, 2007. On July 17, 2007, an e-mail was sent from Barbara Gorin to you and Laurie Quintel asking you to contact her to select an Arbitrator from the June 8, panel.

Since there was no response to that e-mail, Ms. Gorin sent you and Ms. Quintel another e-mail on July 24, once again, listing all the cases, and asking you to contact her to select Arbitrators. On that same day, Marveline Carrell left you a voice mail message, following up on the email.

Since we did not receive any response, on August 21, 2007, Barbara Gorin sent you another e-mail, with a copy to Laurie Quintel, again listing the pending cases, and asking you to contact her to select Arbitrators.

There has been no response to date.

All Affected: Union Access: The FMCS panel was requested on April 5, 2007. On May 5, 2007, Barbara Gorin sent you and Laurie Quintel an e-mail asking you to contact her to select an Arbitrator from the April 5, 2007 panel.

On May 10, 2007, you spoke with Barbara Gorin and claimed that you were not authorized to select an Arbitrator for this matter, but asked for the panel to be forwarded to you again. On May 10, 2007, Barbara Gorin sent you the following email, with the panel attached:

"Mr. Arnold: Enclosed is the FMCS list of Arbitrators and the bios for this matter. You indicated that you are not authorized to select an Arbitrator in this matter. Please contact our office once you have been authorized. I will be unavailable from May 15 through May 30, however, you can speak with Marveline Carrell in my absence. Thank you."

On May 17, 2007, Marveline Carrell called you office and left you a voice mail. Your message indicated that you were out of the office until May 21, 2007.



October 18, 2007  
Laurence R. Arnold  
Page 3

On June 6, 2007, Marveline Carrell again contacted your office, and left a voice mail message asking you to contact her to select arbitrators.

Since we did not receive a response, on July 17, 2007, Barbara Gorin sent you and Laurie Quintel another e-mail listing the pending cases, and asking you to contact her to select Arbitrators.

On July 24, 2007, Marveline Carrell followed up with another voice mail message to your office, asking you to contact us to selection Arbitrators.

On August 21, 2007, Barbara Gorin sent another email to you and Laurie Quintel listing the cases, and asking you to contact our office to select Arbitrators.

There has been no response to date.

John Simien Harassment - Accusation Leading to Shift Change: On June 22, 2007, a FMCS panel was requested. On July 24, 207 Barbara Gorin sent you and Laurie Quintel an e-mail message, asking you to contact her to select Arbitrators from the pending matters.

Since there was not any communications from you, Marveline Carrell left you a detailed voice mail message on July 24, 2007 asking you to contact her to select Arbitrators from these pending matters.

On August 21, 2007, Barbara Gorin sent you another e-mail, with a copy to Laurie Quintel, again listing the pending cases, and asking you to contact her to select Arbitrators.

There has been no response to date.

James Satuito Discharge: On June 12, 2007 our office requested a FMCS panel. By letter dated June 12, 2007, you wrote a letter requesting that we get a new panel of Arbitrators. We agreed, and on June 21, 2007, we requested a second FMCS list.

Since we did not receive a response, on July 17, 2007, Barbara Gorin sent you and Laurie Quintel another e-mail listing the pending cases, and asking you to contact her to select Arbitrators.

On July 24, 2007, Marveline Carrell followed up with another voice mail message to your office, asking you to contact us to selection Arbitrators.

On August 21, 2007, Barbara Gorin sent another email to you and Laurie Quintel listing the cases, and asking you to contact our office to select Arbitrators.

There has been no response to date.

All Affected: Union Access (Union Reps Hereth & Olick Arrests): FMCS panel requested June 18, 2007.

Since we did not receive a response, on July 17, 2007, Barbara Gorin sent you and Laurie Quintel another e-mail listing the pending cases, and asking you to contact her to select Arbitrators.

October 18, 2007  
Laurence R. Arnold  
Page 4

On July 24, 2007, Marveline Carrell followed up with another voice mail message to your office, asking you to contact us to selection Arbitrators.

On August 21, 2007, Barbara Gorin sent another email to you and Laurie Quintel listing the cases, and asking you to contact our office to select Arbitrators.

There has been no response to date.

Oscar Portillo - Denied Vacation Requests/Harassment & Discrimination: FMCS panel requested July 25, 2007. On August 21, 2007, Barbara Gorin sent an email to you and Laurie Quintel listing the cases, and asking you to contact our office to select Arbitrators.

There has been no response to date.

By this letter, we reconfirm our request for arbitration on behalf of SEIU, Local 715, and I again ask that you contact our office immediately for the purpose of selecting Arbitrators from the FMCS panels of arbitrators.

We have been authorized by the Union to file and serve a Petition to Compel Arbitration, seeking a judgment ordering final and binding arbitration. If you do not contact us and select arbitrators within ten days of the date of this letter, we will proceed with the lawsuit. We will insist upon the recovery of attorneys' fees necessitated by your apparent refusal to arbitrate the pending disputes. I trust that this will not be necessary.

Sincerely,



W. Daniel Boone

WDB/bag  
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